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ABG 23 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

5 Attorneys for Defendant
Maeda Pacific Corporation

15 TOSHIHIRO TAKAHASHI,
16 Plaintiff,

CIVIL ACTION NO. CV 05-0026

**PRE-DISCOVERY DISCLOSURE
STATEMENT OF DEFENDANT
MAEDA PACIFIC CORPORATION**

21 Comes now Defendant Maeda Pacific Corporation and pursuant to LR 16.2 CJ (d) and
22 Federal Rules of Civil Procedure 26(a) hereby files its Pre-Discovery Disclosure Statement.

24 A. Individuals likely to have Discoverable Information

25 Name Likely Subject of Information
26 Toshihiro Takahashi Incident of March 17, 2005
27 Address Unknown

1 As Defendant had no prior notice of the alleged incident of March 17, 2005 and no claim was
2 made prior to suit being filed, Defendant is at this time unable to identify any other individuals
3 who are likely to have discoverable information which supports Defendant's defense.

4
5 B. Description of documents and tangible things in the custody and control of Defendant
6 that are relevant to disputed facts alleged with particularity in the pleadings

7 1. Defendant has in its possession with copy of Contract No. 306-05 for the Garapan Tourist
8 District Revitalization (Coral Tree Avenue) project. Defendant presumes from the allegations of
9 Plaintiff's Complaint that Plaintiff's counsel has a copy of this document. If Plaintiff's counsel
10 does not have a copy of the Contract, Defendant will provide it to counsel.

11
12 As Defendant had no prior notice of the alleged incident of March 17, 2005 and no claim was
13 made prior to suit being filed, Defendant is at this time unable to identify any other tangible
14 things that are in its possession or control that it may use to support its defenses.

15
16 C. Computation of Damages

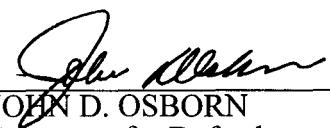
17 No computation of damages has been made by Defendant.

18
19 D. Insurance Agreement

20 The insurance agreement in effect for the alleged incident of March 17, 2005 will be
21 provided to Plaintiff's counsel prior to the Case Management Conference.

22
23 CARLSMITH BALL LLP

24
25 DATED: Saipan, MP, August 23, 2005.


26 JOHN D. OSBORN
27 Attorneys for Defendant
28 Maeda Pacific Corporation